



September 27, 2023

Via ECF

Hon. Cheryl L. Pollak
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East, Courtroom 13B-South
Brooklyn, New York 11201

Re: *Dorina Sokolovsky v. Oorah, Inc., Oorah Catskill Retreat LLC a/k/a "The Zone" and Gittie Sheinkopf*
Case No. 1:20-cv-04116

Dear Judge Pollak,

I am an attorney with the law firm of Twersky PLLC, counsel for Defendant Gittie Sheinkopf ("Sheinkopf") in the captioned matter. I respectfully submit this request to extend time to reply to Plaintiff's pre-motion letter response ("Response") (ECF No. 93) to Sheinkopf's pre-motion letter seeking to file a motion for sanctions against Plaintiff and Plaintiff's counsel ("Pre-Motion Letter").

On September 22, 2023, Plaintiff filed her Response to Sheinkopf's Pre-Motion Letter, which improperly contained fourteen (14) pages. *See* ECF No. 93. Included in Plaintiff's Response was a new proposal to resolve this discovery dispute, which was different from what the parties had previously discussed. Due to the Jewish High Holidays, including Yom Kippur, which was this past Monday, September 25, 2023, Sheinkopf has not yet had the opportunity to discuss Plaintiff's new proposal. In the interest of resolving this discovery dispute amicably, Sheinkopf requests that the Court extend the time to reply to Plaintiff's Response to October 5, 2023, so that the parties can meet and confer regarding Plaintiff's new proposal.

Thank you in advance for Your Honor's consideration.

Respectfully yours,

Aaron Twersky, Esq.

cc: All Counsel (via ECF)